

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

MAX MINDS, LLC,	)	
	)	
Plaintiff,	)	
	)	
	)	CAUSE NO. 1:24-CV-00779-MPB-MKK
v.	)	
	)	JURY TRIAL DEMANDED
TRIANGLE EXPERIENCE GROUP, INC.,	)	
ROBERT CLARE, JEFFREY MASE,	)	
KEVIN MULLICAN, and JOHN DOES 1-	)	
10,	)	
	)	
Defendants.		

**DECLARATION OF ROBERT SIMON IN SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION AND SEIZURE ORDER**

I, Robert Simon, declare and say:

1. I am a Senior Software Engineer for Max Minds, LLC (“MAX”). I make this declaration based on my personal knowledge in support of Max’s motion for preliminary injunction and seizure order.
  
2. I have over twenty years’ experience developing and maintaining computer software. I am involved in the development of MAX’s Alleo, Haptic, and Haptic Federal software programs. I am familiar with the Haptic Federal source code.
  
3. Attached hereto as Exhibit 1 is a memorandum I prepared that explains how I personally discovered, reviewed and captured the MAX software applications and associated Haptic Federal source code that TEG had exposed publicly on the internet on three public facing Uniform Resource Locators (“URL”).
  
4. I documented the process I used in a screen grab video that I am prepared to present to the Court in this case.

5. At each URL the servers hosting the Haptic Federal software, MAX's software source code maps and source code were exposed to the public internet.

6. The exposure of MAX's Haptic Federal source code is a serious issue of concern for MAX since it exposed MAX's trade secrets to the public that TEG is required to maintain as secret.

7. In each instance I observed that TEG removed the Haptic CMI from the Haptic Federal software and replaced the Haptic CMI with false CMI indicating that the software was TEG's software by using the terms "VJOC" and "C4MAP."



8. I am familiar with the copyright applications filed by MAX detailed in the declaration of Brandon Fischer. I reviewed the source code on the websites where TEG exposed MAX's software publicly. The source code is substantially similar or identical to MAX's copyrighted source code.

9. This review further confirmed TEG's unauthorized modification and development of Max's Haptic Federal software source code.

10. The source code exposed by TEG contained TEG's own release notes which listed the changes made by TEG.

I declare under perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on November 25, 2024.

  
  
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